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Attorneys For Plaintiffs

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

BORIS GOLDENBERG, REINALDO
PACHECHO, ANDREW LEOW and
GERALD COMEAU, as representative of a
class of similarly situated persons and on
behalf of THE INDUCTOTHERM
COMPANIES MASTER PROFITS
SHARING PLAN #001,

Plaintiffs,

vs.

INDEL, INC., individually and a/k/a
INDUCTOTHERM INDUSTRIES, INC. and
INDUCTOTHERM CORPORATION, et al.,

Defendants.

Civil No. 1:09-cv-5202-JBS-AMD

**NOTICE OF CROSS-MOTION
FOR SUMMARY JUDGMENT**

PLEASE TAKE NOTICE that on January 3, 2011, or as soon thereafter as

the matter may be heard, the undersigned attorney for Plaintiffs, Boris Goldenberg, Reinaldo Pachecho, Andrew Leow and Gerald Comeau, as representatives of a class of similarly situated persons and on behalf of the Inductotherm Companies Master Profits Sharing Plan #001, will apply to the United States District Court, District of New Jersey, at the United States Court House located at 4th & Cooper Streets, Room 1050, Camden, NJ 08101, for an Order granting Summary Judgment on Counts III, VI, and XI of Plaintiffs' First Amended Complaint.

PLEASE TAKE FURTHER NOTICE that the undersigned shall rely upon the accompanying Declaration of Robert L. Lakind and Plaintiffs' brief in support of this motion.

SZAFERMAN, LAKIND,
BLUMSTEIN & BLADER, P.C.
Attorneys for Plaintiffs

s/R.Lakind

Robert L. Lakind, Esq.

Dated: December 5, 2011